

Case 1:19-cv-00304-TRM-CHS Document 63 Filed 04/02/20 Page 1 of 5 PageID #: 364

Allegations of injuries caused by the Defendants requiring medical care and mental health care have been made by all of the Plaintiffs either by an adult Plaintiff or on behalf of a minor Plaintiff. See the complaints in the following cases.

- *Riley v. Hamilton County Government et al*: 1:19-cv-304, Doc. 1-1 Page ID #15 (¶ 82)
- *Mitchell et al v. Hamilton County Government et al*: 1:19-cv-305, Doc. 1-1 Page ID#16 (¶ 99).
- *Johnson v. Hamilton County Government et al*; 1:19-cv-329, Doc. 1-1 Page ID#16 (¶ 106).
- *Lemons v. Hamilton County Government et al*; 1:20-cv-00019 Doc. 1-2 Page ID#26 (¶124).
- *Johnson et al. v. Hamilton County Government et al*; 1:20-cv-17, Doc. 1-2 Page ID#25-26 (¶ 136
- *Vineyard et al. v. Hamilton County Government et al*; 1:20-cv-20, Doc. 3-2 Page ID#76 (¶ 153).
- *Cummings v. Hamilton County Government et al*; 1: 19-cv-00348, Doc. 1-1 Page ID#19 (¶ 111).

This is just a sampling of the allegations contained in these complaints that claim physical or mental injuries.

At least one allegation of a juvenile arrest of Plaintiff A.M. has been made that is characterized as retaliatory by that Plaintiff in *Lemons v. Hamilton County Government et al*. It is very likely that information that is confidential will be received by the parties to this case.

Fed. R. Civ. P. 26(c) specifically authorizes the use of protective orders in appropriate circumstances. Confidentiality orders are certainly allowed by case law in this circuit. The

confidentiality, or secrecy, if you will, of material gained in discovery allowed. See *Shane Grp., Inc. v. Blue Cross Blue Shield of Mich*, 825 F.3d 299, 305 (6th Cir.2016). However, the parties to this case are aware that the confidentiality of this material gained in discovery is still subject to entering the public domain at the litigation stage of the lawsuits here and this issue of information coming into the record under seal is a different issue than that addressed by the Protective Order being proposed here.

The parties jointly request that this court enter the proposed order being filed with this motion.

IT IS SO ORDERED.

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CHRIS H. STEGER  
UNITED STATES MAGISTRATE JUDGE  
TRAVIS R. MCDONOUGH  
UNITED STATES DISTRICT JUDGE

**APPROVED FOR ENTRY:**

**TIDWELL & ASSOCIATES, P.C.**

/s/ W. Gerald Tidwell, Jr.

**W. Gerald Tidwell, Jr., BPR #10136**

1810 McCallie Ave.

P.O. Box 4369

Chattanooga, TN 37405

(423) 602-7511 (Telephone)

(423) 602-7515 (Facsimile)

wgt@tidwellandassociates.com

***Attorney for Defendant Deputy Jacob Goforth,  
Bobby Brewer and Tyler McRae***

**ROBIN FLORES LAW**

*/s/ Robin Flores*

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**Robin Flores, BPR #020751**

4110-A Brainerd Road

Chattanooga, TN 37411

(423) 267-1575

Email: [robin@robinfloreslaw.com](mailto:robin@robinfloreslaw.com)

Email: [wendisloop@yahoo.com](mailto:wendisloop@yahoo.com)

*Attorney for Shandle Marie Riley, James Myron*

*Mitchell, Latisha Shana Menifee, Angel Cherie*

*Johnson, Debra Cummings, Kelsey Wilson,*

*Michael Johnson, Jennifer Johnson, Joleen*

*Lemmons, Billy Ray Vineyard and Karen Topping*

**HAMILTON COUNTY ATTORNEY'S OFFICE**

*/s/ Dee Hobbs*

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**R. Dee Hobbs, BPR#010482**

204 County Courthouse

625 Georgia Avenue

Chattanooga, TN 37402

423-209-6150

Fax: 423-209-6151

Email: [bell.hobbslaw@gmail.com](mailto:bell.hobbslaw@gmail.com)

*Attorney for Hamilton County Government*

**HAMILTON COUNTY ATTORNEY'S OFFICE**

*/s/ Sharon McMullan Milling*

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**Sharon McMullan Milling, BPR#036876**

204 County Courthouse

625 Georgia Avenue

Chattanooga, TN 37402

423-209-6150

Fax: 423-209-6151

Email: [sharonm@hamiltontn.gov](mailto:sharonm@hamiltontn.gov)

*Attorney for Hamilton County Government*

**PRO SE LITIGANT**

*/s/ William Klaver*

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**William Klaver**

P.O. Box 58

Hixson, TN 37343

310-492-3190

[jazznblues@live.com](mailto:jazznblues@live.com)

*Pro Se Litigant*

**ADVICE LAW FIRM**

*/s/ James Michah Guster*

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**James Micah Guster, BPR #029586**

1502 McCallie Avenue

Chattanooga, TN 37404

423-485-8088

[advicelawfirm@gmail.com](mailto:advicelawfirm@gmail.com)

*Attorney for Daniel Wilkey*

**CHAMBLISS, BAHNER & STOPHEL, P.C.**

*/s/ James F. Exum*

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**James F. Exum, III, BPR #025377**

Liberty Tower

605 Chestnut Street

Suite 1700

Chattanooga, TN 37450

423-756-3000

Email: [JFexum@chamblisslaw.com](mailto:JFexum@chamblisslaw.com)

*Attorney for Daniel Wilkey*

**CHAMBLISS, BAHNER & STOPHEL, P.C.**

*/s/ Logan Chase Threadgill*

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**Logan Chase Threadgill, BPR #034470**

Liberty Tower

605 Chestnut Street

Suite 1700

Chattanooga, TN 37450

423-756-3000

Email: [lthreadgill@chamblisslaw.com](mailto:lthreadgill@chamblisslaw.com)

*Attorney for Daniel Wilkey*